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March 18, 2025

VIA ECF

Hon. Louis L. Stanton
United States District Judge for
the Southern District of New York
United States Courthouse
500 Pearl Street, Courtroom 21C
New York, New York 10007

Re: *Paul Philippe of Romania, on behalf of the Estate of King Carol II of
Romania v. Christie's, Inc.*, 1:25-cv-1151-LLS

Dear Judge Stanton:

Pursuant to Local Civil Rule 37.2 and Section 2.A of your Individual Practices, Plaintiff/Interpleader Defendant Paul Philippe of Romania ("Paul Philippe") requests a conference to resolve a discovery dispute with Defendant/Interpleader Plaintiff Christie's, Inc. ("Christie's").

After Paul Philippe filed his Answer [ECF 22] to Christie's Interpleader Counterclaim/Third-Party Claim [ECF 18 at p. 10], he requested Christie's participate in a Rule 26(f) conference so he could seek discovery from third parties in possession of information relevant to the competing ownership claims. Paul Philippe does not intend to seek discovery against the two third-party Interpleader Defendants, the State of Romania ("Romania") and Access Delight International Ltd. ("Access Delight"), until after they appear in this action and file their answers to the Interpleader.¹

Christie's refuses to participate in a Rule 26(f) conference, however, asserting that discovery is not appropriate until Romania and Access Delight appear and answer. But discovery is not stayed and other third parties, such as New York art dealer Wildenstein & Co., have information relevant to the competing ownership claims that should be preserved through discovery now.

¹ Romania asserted a ownership claim to *Saint Sébastien*, which led Christie's to withdraw the painting from its February 5, 2025 auction. See Verified Complaint [ECF 1] at ¶ 6, Exs. 1, 2. Access Delight is Christie's consignee that wants to sell *Saint Sébastien*. See Christie's Answer [ECF 18] at Interpleader Counterclaim/Third-Party Claim, ¶ 11 (p. 11).

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Hon. Louis L. Stanton
March 18, 2025
Page 2

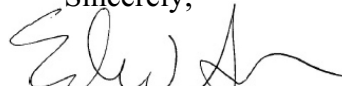
For example, Wildenstein purchased *Saint Sébastien* and another stolen El Greco, *Canon Bosio*, from ex-King Michael of Romania in 1977. See Verified Complaint [ECF 1] at ¶¶ 25-29. Wildenstein resold *Canon Bosio* to the Kimbell Art Museum and resold *Saint Sébastien* to an unknown private collector. *Id.* Information concerning those sales and representations made in connection with them is relevant to Paul Philippe's claim that Michael stole the paintings from his father, King Carol II of Romania.

That information, and relevant information in the possession of other third parties, should be preserved now through third-party discovery. While Access Delight has accepted service and will file its Answer on April 14, 2025, Romania has not agreed to accept service and therefore may not appear in this action for several months. Postponing third-party discovery until then risks that relevant information may not be preserved.

Finally, last Friday, March 14, 2025, and this morning, I sent emails to counsel for Access Delight asking whether Access Delight has a position on this dispute. Counsel for Access Delight has not responded.

Thank you for considering this request.

Sincerely,



Edward Griffith

EG:gb

cc: Joseph A. Patella, Esq.
Daniel J. Kornstein, Esq.